

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP
2 Charles K. Verhoeven (Bar No. 170151)
3 charlesverhoeven@quinnemanuel.com
4 David A. Perlson (Bar No. 209502)
5 davidperlson@quinnemanuel.com
6 Melissa Baily (Bar No. 237649)
7 melissabaily@quinnemanuel.com
8 John Neukom (Bar No. 275887)
9 johnneukom@quinnemanuel.com
10 Jordan Jaffe (Bar No. 254886)
11 jordanjaffe@quinnemanuel.com
12 50 California Street, 22nd Floor
13 San Francisco, California 94111-4788
14 Telephone: (415) 875-6600
15 Facsimile: (415) 875-6700

16 Attorneys for WAYMO LLC

17 UNITED STATES DISTRICT COURT

18 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

19 WAYMO LLC,

20 CASE NO. 3:17-cv-00939-WHA

21 Plaintiff,

22 vs.
23 **DECLARATION OF FELIPE
24 CORREDOR IN SUPPORT OF
25 PLAINTIFF WAYMO LLC'S
26 ADMINISTRATIVE MOTION TO FILE
27 UNDER SEAL PORTIONS OF ITS
28 NOTICE OF SUBMISSION OF
DEPOSITION DESIGNATION PACKETS**

29 Defendants.

30

31

32

33

34

35

36

37

38

1 I, Felipe Corredor, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
 3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
 4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set
 5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Waymo’s Administrative Motion to File Under
 7 Seal Portions of Its Notice of Submission of Deposition Designation Packets, filed concurrently
 8 herewith (the “Administrative Motion”). The Administrative Motion seeks an order sealing the
 9 following materials filed concurrently herewith:

Document	Portions to Be Filed Under Seal	Designating Party
Appendix 1	Entire Document	Defendants
Appendix 2	Entire Document	Waymo; Defendants
Appendix 3A	Entire Document	Defendants
Appendix 3B	Entire Document	Waymo; Defendants
Appendix 4	Entire Document	Defendants
Appendix 5	Entire Document	Defendants
Appendix 6	Entire Document	Waymo; Defendants
Appendix 7	Entire Document	Defendants
Appendix 8	Entire Document	Waymo; Defendants
Appendix 9	Entire Document	Waymo; Defendants
Appendix 10	Entire Document	Waymo; Defendants
Appendix 11	Entire Document	Defendants
Appendix 12	Entire Document	Defendants

20 3. Specifically, the documents identified in the table above as designated by Waymo
 21 contain or refer to trade secret information, which Waymo seeks to seal.

22 4. The documents identified in the table above contain, reference, and/or describe
 23 Waymo’s trade secrets. The information Waymo seeks to seal includes the confidential design and
 24 functionality of Waymo’s proprietary autonomous vehicle system, including its technical
 25 specifications and/or LiDAR designs, which Waymo maintains as secret. I understand that these trade
 26 secrets are maintained as secret by Waymo (Dkt. 25-47) and that the trade secrets are valuable to
 27 Waymo’s business (Dkt. 25-31). The public disclosure of this information would give Waymo’s
 28 competitors access to descriptions of the functionality or features of Waymo’s autonomous vehicle

1 system. If such information were made public, I understand that Waymo's competitive standing
2 would be significantly harmed.

3 5. Waymo's request to seal is narrowly tailored to those portions of Appendices 2-3, 6,
4 and 9 that merit sealing.

5 6. Waymo only seeks to seal the documents identified in the table above as designated by
6 Defendants because Waymo believes such information is considered confidential or non-public by
7 Defendants.

8
9 I declare under penalty of perjury under the laws of the State of California and the United
10 States of America that the foregoing is true and correct, and that this declaration was executed in San
11 Francisco, California, on February 4, 2018.

12 By /s/ Felipe Corredor
13 Felipe Corredor
14 Attorneys for WAYMO LLC

15
16 **SIGNATURE ATTESTATION**

17 Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the
18 filing of this document has been obtained from Felipe Corredor.

19
20 /s/ Charles K. Verhoeven
21 Charles K. Verhoeven